

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V (draft) No. V-98-039

ACCURIDE CORPORATION

Henderson, KY.

April 15, 2000

STUART ECTON, CHEMICAL ENGINEER/ REVIEWER

Plant I.D. # 077-1760-0030

Application Log # F505

SOURCE DESCRIPTION:

Accuride Corporation manufactures steel truck wheels. Following is a brief description of the manufacturing process:

The steel enters the facility in the form of coils, sheets and ready-cut blank forms. These are shot blasted to remove surface rust. The wheels are then formed by bending, flash welding, wire welding and trimming. The wheels are then cleaned before being painted and coated. Finally the wheels are sent through a curing oven and then repair coated and then dried. Please see the application and the attached process flow diagrams for details.

COMMENTS:

Type of control:

Baghouses are utilized to control PM emissions from the shot blasting and welding operations.

Low VOC paints and coatings are used and can be considered a method of controlling VOC emissions.

Emission factors:

AP-42 Section 1.4 (Natural Gas Combustion), AP-42 Section 12.19 (Electric Arc Welding) material balance, EPA/625/6-91/014 EPA Control Technologies for Hazardous air Pollutants.

Applicable regulations:

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations.

401 KAR 59:015, New indirect heat exchangers.

401 AKR 59:010, New process operations.

401 KAR 61:020, Existing process operations.

EMISSION AND OPERATING CAPS DESCRIPTION:

An average VOC content limit of 3.5 lbs/gallon has been included in the permit pursuant to Regulation 401 KAR 59:225. A recordkeeping requirement has also been included and is sufficient to ensure compliance since all paint manufacturers list VOC content on the respective MSDS. An MSDS can quickly be matched to a specific coating upon request of our inspector.

PM and opacity limits are also included pursuant to the applicable regulations: 401 KAR 59:010 and 59:015. Since emissions can be easily and accurately estimated using well established emission factors, an annual method 9 reading is deemed sufficient to ensure compliance. In addition, the affected facilities are not realistically capable of being operated in a manner which would cause the exceedance of the PM or the opacity standard. In fact, an opacity problem has never been observed at this facility.

OPERATIONAL FLEXIBILITY:

NA

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

COMMENTS:

None received.